



MURIEL GOODE-TRUFANT  
*Corporation Counsel*

**THE CITY OF NEW YORK  
LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**SHINEQUA CHARLES**  
Labor & Employment Law Division  
Phone: 212-356-2458  
shcharle@law.nyc.gov

May 23, 2025

**By ECF**

Honorable Marcia M. Henry  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Matyas et al v. Department of Education of the City Of New York, et. al.  
25-CV-01861 (MMH)

Dear Judge Henry :

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney recently assigned to represent Defendant New York City Department of Education (“DOE”), DOE Chancellor Melissa Aviles-Ramos, and Katherine Rodi in the above-referenced action. Plaintiffs, who are three former DOE teachers, allege that they were wrongfully denied exemptions to the DOE’s Covid-19 vaccine employment condition.

I write to respectfully request an extension of time, from May 27, 2025 until July 25, 2025, for Defendants to respond to the Complaint. I reached out to the three Plaintiffs proceeding *pro se*, via email and telephone, on May 22, 2025, but at the time of filing this request, have not heard back. This is Defendants’ first request for an extension of time in this matter, and the requested extension will not affect any other deadlines.

This extension is requested so that I can investigate the allegations in the Complaint and prepare a proper response. The extension also accounts for professional obligations in multiple other matters and a previously scheduled vacation next week.

Accordingly, Defendants respectfully request that the Court grant an extension of time, until July 25, 2025, for Defendants to respond to the Complaint.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Shinequa Charles  
Shinequa Charles  
Assistant Corporation Counsel

cc: Via First Class Mail and Email  
Annabelle Matyas  
Plaintiff *Pro Se*  
7632 170th Street  
Fresh Meadows, NY 11366

Daisy Badillo  
Plaintiff *Pro Se*  
13 Darin Road  
Warwick, NY 10990  
ddavictory1021@gmail.com

Dahlia Mendoza  
5005 164th Street  
Fresh Meadows, NY 11365  
Email: ddavictory1021@gmail.com